

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

Case No.: 00-6026 CIV-Ferguson  
Magistrate Judge Snow

WORLDNET COMPANIES, INC.  
a Florida corporation


Plaintiff

v.

KLELINE, a Limited Company,  
a corporation incorporated under the law of  
France, ABDALLAH HITTI, individually;  
AYHUB HITTI, INDIVIDUALLY;  
BANQUE PARIBAS S.A., a banking corporation  
incorporated under the laws of France;  
OCRAM EST., a Liechtenstein corporation; and  
MICHAEL BENDE, individually

Defendants

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FILED BY   
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CLERK, U.S. DIST. CT.  
S.D. OF FLA.-FTL

**MOTION TO VACATE CLERK'S ENTRY OF DEFAULT**

Defendant, OCRAM EST. ("OCRAM"), by and through its newly appearing undersigned counsel does hereby file a Motion to Vacate Clerk's Default as entered against it on April 3, 2000 and as grounds therefore states the following:

1. OCRAM recently consulted with the undersigned on Thursday, April 27, 2000.
2. Previously OCRAM was under the impression that it was at that time, represented by counsel for MICHAEL BENDE, a Defendant named individually in the above-styled matter and, as a result, no pleadings on behalf of OCRAM itself were actually filed through the excusable mutual mistake and/or excusable neglect as all parties were under the impression that OCRAM had counsel.

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3. Unfortunately, OCRAM did not have counsel previously in this regard and as a result no pleading was filed and as such, the Clerk entered a Default less than one (1) month ago.

4. OCRAM fully intends to have representation in this matter and is a separate and distinct entity from MICHAEL BENDE and separate counsel is necessary to present each.

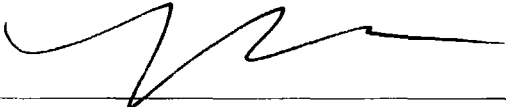
5. The pleadings are at an early enough stage such that no party is prejudice by the Court vacating the Clerk's Default in this regard.

6. The undersigned is filing this Motion at the earliest possible time and to avoid delay and any affidavits that may support said Motion may follow.

I HEREBY CERTIFY that a copy of the foregoing was furnished to Charles Cohen, Esq. and Leslie Scott Osborne, Furr and Cohen, P.A., Attorneys for BENDE, 1499 West Palmetto Park Road, Suite 412, Boca Raton, Florida; to John C. Rayson, Esq., Attorney for PLAINTIFF, 2400 East Oakland Park Boulevard, Fort Lauderdale, Florida 33306; William D. McEachern, Esq., Winthrop, Stimson, Putman & Roberts, Attorneys for KLELINE, 125 Worth Avenue, Suite 310, Palm Beach, Florida 33480; Gina Anne Dombosch, Esq., Valerie Greenberg, Itkoff, Esq., and Edward Soto, Esq., Weil Gotshal & Manges, Attorneys for BANQUE PARIBAS, S.A. 701 Brickell Avenue, Suite 2100, Miami, Florida, this 1<sup>st</sup> day of May, 2000.

LAVALLE, BROWN, RONAN & SOFF, P.A.

Attorneys for OCRAM  
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LAWRENCE K. FAGAN, ESQUIRE  
FLORIDA BAR NO.: 999857